



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street, 3rd floor  
New York, New York 10007*

May 31, 2017

**BY ECF**

The Honorable John G. Koeltl  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *Flores v. United States Dep't of Justice*,  
No. 17 Civ. 0036 (JGK)

Dear Judge Koeltl:

This Office represents the United States Department of Justice ("the Government"), the defendant in the above-referenced case, which arises under the Freedom of Information Act ("FOIA"). I write respectfully to request that the Court order one additional production deadline past the schedule that is currently in place, in order to allow the Government to complete its release of non-privileged documents responsive to Plaintiff's FOIA requests. I have sought Plaintiff's position on this application, but have not yet received his response.

On April 17, 2017, the Court ordered the Government to make its first release of documents responsive to Plaintiff's FOIA requests on April 27, 2017, and to complete its release of responsive documents by June 2, 2017 (Dkt. No. 16). As the Government explained in its status report dated May 25, 2017, the Government did make its first release on April 27 (Dkt. No. 20). The Government intends to make a second release on June 2, 2017, which will include the entirety of the first release, in light of Plaintiff's contention that he has not yet received that entire release. The second release also will include additional responsive materials. However, the Government respectfully requests the Court's leave to complete its FOIA production by June 16, 2017. The reason for this request is the Government's need to collect responsive materials from additional locations and to obtain agency consultation, review, and approval regarding its final release.

This is the Government's first request for an additional production deadline in this case. Although, as stated above, Plaintiff has not yet provided his position with respect to this particular application, the Government notes that in his letter dated May 16, 2017, Plaintiff himself asked the Court to extend the deadlines currently in place in the event

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the Government needed additional time to complete its release of responsive materials (Dkt. No. 18). Thank you for your attention to this matter.

Respectfully,  
JOON H. KIM  
Acting United States Attorney

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cc (via ECF): Louis Flores